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August 2, 2022

Hon. Jose. R. Almonte, U.S.M.J.  
United States District Court, District of New Jersey  
Frank Lautenberg & U.S. Courthouse  
2 Federal Square  
Newark, New Jersey 07102  
Three Gateway Center

Re: Jane Doe v. Douglas Wisch  
Civil Action No. 21-11183 (MCA) (MAH)

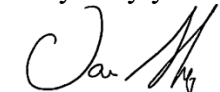
Dear Judge Almonte,

This letter is in response to Defense Counsel's letter of August 1, 2022. Defense counsel is seeking to take Plaintiff's follow-up deposition notwithstanding discovery is stayed by this Court's May 25<sup>th</sup> Order. Defense counsel sought to change this Court's Order by letter of July 6, 2022. This Court's text order denying the request was filed July 7, 2022. Defense Counsel's prior July 6<sup>th</sup> letter only caused unnecessary delay. It was filed just three business days before the July 12<sup>th</sup> mediation, causing the mediation to be rescheduled to August 18<sup>th</sup> before Judge Falk. Pursuant to this Court's text Order of July 26<sup>th</sup>, the Mediation completion deadline was extended to August 25, 2022. Plaintiff's counsel is away on vacation until August 8<sup>th</sup> and I have a full schedule between the date I return from vacation and August 18<sup>th</sup> when mediation is scheduled.

Defense Counsel's reason to take Plaintiff's follow-up deposition is no different from before when he argued the need to address "significant issues in obtaining Plaintiff's medical records". As stated before, Plaintiff was diagnosed with Lupus decades after the abuse occurred. Certain records were sought but not found as Plaintiff's doctor is deceased. Those records are not relevant to mediation and arguably not admissible at trial.

Plaintiff therefore once again opposes Defendant's attorney's efforts to void the discovery stay pending mediation for the reasons stated above.

Very truly yours,



Daniel Shapiro

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